

United States District Court
for the
District of South Carolina
Spartanburg Division

Robert Moss, individually and as)
general guardian of his minor child,)

and)

Ellen Tillett, individually and as)
general guardian of her minor child,)

and)

Civil Action No. 7:09-1586-RBH

The Freedom From Religion)
Foundation, Inc.,)

Plaintiffs)

v.)

Spartanburg County School District)
No. 7, a South Carolina body politic)
and corporate)

Defendant)

PLAINTIFFS' ANSWERS TO INTERROGATORIES
(LOCAL RULE 26.01 DSC)

Now come Plaintiffs and respectfully submit these answers to the Local Rule 26.01 DSC Interrogatories.

(A) State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

ANSWER: None

(B) As to each claim, state whether it should be tried jury or nonjury and why.

ANSWER: Non-Jury. Only declaratory relief is sought.

(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

ANSWER: (1). No. (2), (3). Not applicable.

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). *See* Local Civil Rule 3.01.

ANSWER: A substantial part of the events or omissions giving rise to the claims occurred in this Division, and Defendant does business in this District relating to the events or omissions alleged.

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which *may be* related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

ANSWER: No.

Respectfully submitted, June 12, 2009.

s/ Aaron J. Kozloski
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